



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

May 31, 2017

Mr. Craig Hupp, General Mgr.  
The Lubrizol Corporation  
155 Freedom Rd.  
Painesville, Ohio 44077

Re: The Lubrizol Corporation  
Notice of Violation (NOV)  
Air Permit  
Lake County  
0243000024

**CERTIFIED MAIL**

**Division of Air Pollution Control**

91 7199 9991 7037 2079 5873

Dear Mr. Hupp:

On April 29, 2017, The Lubrizol Corporation submitted the quarterly report for the continuous emissions monitoring systems as required by the Title V permit, P0084846, issued on December 15, 2015. The report was reviewed on May 18, 2017.

**Findings**

Based on a review of the quarterly report, Ohio EPA has determined that emissions unit N001 violated the permitted allowable carbon monoxide (CO) emissions limitation. In order to bring your facility into compliance, we recommend promptly addressing this violation within the timeframes outlined in this letter.

1. Ohio Revised Code (ORC) 3704.05(J)(2): *"No person shall...violate any applicable requirement of a Title V permit or any permit condition..."*

Title V permit P0084846, section C.6.b)(2)e.: "Carbon monoxide in excess of 100 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen...and reported as propane."

40 CFR Part 63, Subpart EEE, section 63.1219(a)(5)(i): *"You must not discharge or cause combustion gases to be emitted into the atmosphere that contain carbon monoxide in excess of 100 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, and reported as propane."*

The terms and conditions of Title V permit P0084846, and the requirements of 40 CFR Part 63, Subpart EEE, establish a CO emissions limitation of 100 parts per million by volume (ppmv), over an hourly rolling average.

(a) *Violation:*

The quarterly report submitted on April 29, 2017, identified the measured CO emissions rates above the emissions limitation on January 27, 2017, from 7:22 a.m. to 8:21 a.m., with a peak value of 130.6 ppm, as an hourly rolling average.

An exceedance of the CO emissions limitation, as identified above, is considered a violation of the terms and conditions of P0084846 and ORC 3704.05(J)(2).

(b) *Requested action:*

Within 30 days of receipt of this letter, The Lubrizol Corporation shall submit a compliance plan to Ohio EPA which will identify how the facility will address the emissions exceedance identified above and how exceedances of this type will be prevented in the future.

**Conclusion**

The Ohio EPA requests that The Lubrizol Corporation promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. **Within 30 days of receipt of this letter**, please provide documentation to Ohio EPA of the actions taken to resolve the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically by email to the email address below.

Failure to comply with Chapter 3704. of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, The Lubrizol Corporation is requested to submit written correspondence describing the steps that will be taken by a date certain to attain compliance.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Section 3704.06 of the Ohio Revised Code.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact me by phone at (330) 963-1252 or by email at [erik.bewley@epa.ohio.gov](mailto:erik.bewley@epa.ohio.gov).

Respectfully,



Erik M. Bewley  
Environmental Specialist  
Division of Air Pollution Control  
Northeast District Office

EMB:bo

ec: John Paulian/James Kavalec, DAPC/CO  
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